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GERALDS ENERGYHUMAN RIGHTS POLICY STATEMENT

Geralds Energy places the dignity, freedom and wellbeing of every individual at the heart of how we do business. We pledge to protect and promote human rights across all our operations, projects, and partnerships.

This Policy is issued in accordance with the Constitution of the Federal Republic of Nigeria, the Nigerian Code of Corporate Governance, and the United Nations Guiding Principles on Business and Human Rights. It sets the standard for how we treat our people, our host communities, and everyone we work with.

1.1 Commitment to Human Rights

Our approach is anchored on globally recognized principles including the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the UN Guiding Principles on Business and Human Rights. We believe business should be a force for good, and that respect for human rights is non-negotiable.

1.2 Human Rights Due Diligence

Human rights form a core part of our due diligence and compliance framework, as embedded in our Code of Business Conduct. Our expectations extend to our suppliers, contractors, vendors and other business partners. All partners are required to comply with our Code of Conduct for Business Partners, which mirrors this, Policy. Geralds Energy will not retain any partner that breaches these human rights commitments. We continuously identify, prevent and mitigate any negative human rights impact arising from our activities through proactive due diligence and preventive controls.

2.0 COMMUNITY RELATIONS AND STAKEHOLDER ENGAGEMENT

We understand that our presence affects the communities where we operate. We are determined to build relationships based on trust, openness and mutual respect. We actively listen to community leaders, residents and other stakeholders, and take their views seriously in our decision-making. Where human rights issues arise, we will engage in meaningful dialogue and seek locally driven solutions. We also invest in economic empowerment, skills development and social initiatives that create lasting value and goodwill in our host communities.

3.0 EMBRACING DIVERSITY AND EQUALITY

We celebrate the uniqueness of our people and the value they bring. Geralds Energy has a deep-rooted commitment to equal opportunity and a firm stance against discrimination and harassment.We maintain workplaces that are free from bias based on race, gender, colour, ethnicity, national or social origin, religion, age, disability, political views, or any other status protected by law. Decisions on recruitment, hiring, placement, training, remuneration and promotion are based solely on merit, qualification, competence, skills and performance. We

champion equal pay for equal work. We do not condone disrespectful conduct, unfair treatment or retaliation of any kind. Harassment has no place in our workplace or in any work-related setting outside the workplace. These principles apply equally to our employees and to all business partners who work with us.

4.0 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We uphold the right of every employee to freely join, form, or choose not to join a trade union, without fear of victimization, intimidation or harassment. Where employees are represented by a recognized union, we commit to genuine and constructive engagement with their elected representatives and to negotiate in good faith.

5.0 SAFE AND HEALTHY WORK ENVIRONMENT

We provide a safe, healthy and productive workplace in full compliance with applicable safety and health laws, regulations and internal standards. We are focused on eliminating accidents, injuries and exposure to health hazards. We work hand-in-hand with our employees to continuously improve safety, identify risks early, and resolve health and safety concerns promptly.

6.0 WORKPLACE SECURITY AND PROTECTION

We are dedicated to a workplace free from violence, threats, harassment, intimidation and other disruptive or unsafe conditions, whether from internal or external sources. Security measures for employees are provided where needed, while always safeguarding privacy and dignity.

7.0 ZERO TOLERANCE FOR SLAVERY, FORCED LABOUR AND HUMAN TRAFFICKING

We strictly forbid slavery, servitude, forced, bonded or compulsory labor in any form, and any involvement in human trafficking, in line with international conventions including ILO Convention No. 29 on the Abolition of Forced Labor.

8.0 PROHIBITION OF CHILD LABOUR

We comply with all local laws on minimum age of employment and with international labor standards. We do not employ any person below 18 years of age in hazardous work, in line with ILO Convention 182 and ILO Convention 138.

9.0 WORKING HOURS, WAGES AND BENEFITS

We offer competitive remuneration in line with industry standards and the local labor market. We fully comply with all laws relating to wages, working hours, overtime, leave and employee benefits.

10.0 GUIDANCE, COMMUNICATION AND REPORTING

We foster a culture where open, honest and respectful communication is encouraged and valued. We comply with all applicable labor and employment laws in every jurisdiction where we operate. Any employee or stakeholder with questions about this Policy, or who wishes to report a possible breach, may raise concerns through established channels, with confidentiality assured. Reports may also be made through the Geralds Energy Whistleblowing Policy and anonymously through the Ethics and Compliance helpline. Geralds

Energy is committed to investigating all reports promptly, addressing concerns fairly, and taking corrective action where a violation is confirmed.

11.0 MONITORING AND EVALUATION

We monitor and evaluate the effectiveness of our human rights policies and practices through regular audits, reviews and assessments, in line with best practices and evolving industry standards.

12.0 TRAINING AND AWARENESS

We provide regular training and awareness programmes for employees on human rights, including discrimination, harassment, diversity, inclusion and the principles contained in this Policy.

13.0 POLICY REVIEW

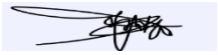
This Policy shall be reviewed at least once every three years and updated as necessary to reflect changes in legislation, standards, codes of practice, objectives and targets.

This Policy shall be reviewed every five (5) years or as deemed necessary, in line with the applicable laws.

Approved by the Board of Directors

8 days of April 2025

CHAIRMAN



Obinna Ogbudike